

PILLSBURY WINTHROP SHAW PITTMAN LLP
RONALD L. CHENG (138892)
ronald.cheng@pillsburylaw.com
AARON S. DYER (161798)
aaron.dyer@pillsburylaw.com
REBECCA M. LEE (312039)
rebecca.lee@pillsburylaw.com
725 South Figueroa Street, Suite 3600
Los Angeles, CA 90017-5524
Telephone: 213.488.7100
Facsimile: 213.629.1033

Attorneys for Defendant
Ibrahim Ameen AlHusseini

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

IBRAHIM AMEEN ALHUSSEINI,

Defendant.

Case No. MJ24-6166

**DECLARATION OF RONALD L.
CHENG REGARDING
SURRENDER OF FIREARM
PURSUANT TO COURT'S BOND
ORDER**

*[Filed concurrently with Joint
Stipulation for Modification of Bond
Order; Declarations of Sureties]*

Trial Date: Not Set

DECLARATION OF RONALD L. CHENG

I, Ronald L. Cheng, make the following declaration:

1. I am over the age of 18 years, of sound mind, and competent to testify in this matter. Unless otherwise indicated, I make the statements in this declaration based on my personal knowledge of the facts set forth herein, and if sworn, I could and would competently testify to them. I am a partner at Pillsbury Winthrop Shaw Pittman LLP and one of the attorneys representing Defendant Ibrahim Ameen AlHusseini (“Defendant”) in this present action brought by Plaintiff United States Attorney’s Office (“Plaintiff”). I am an attorney admitted to practice in the courts of the State of California and this District Court. I make this declaration, in support of the Joint Stipulation for Modification of Bond Order (“Joint Stipulation”).

2. On Monday, October 21, 2024, the Court set conditions of release and an appearance bond for Mr. Alhusseini. (Dkt. 15.)

3. On November 12, 2024, Defendant submitted a Joint Stipulation for Modification of Bond Order on behalf of both parties. (Dkt. 24.)

4. Under “other conditions” of the appearance bond, are to “Surrender any such firearm to a responsible third party and provide proof to Pretrial Services.”

5. In satisfaction of this term, Mr. AlHusseini’s assistant, Christian Chavez, surrendered Mr. AlHusseini’s only firearm to the armory Modern Warrior Gunsmithing LLC, located at 11276 Washington Place, Culver City, CA 90230 on October 29, 2024. A true and correct receipt of this surrender is attached as **Exhibit A**.

//

//

6. On that same day, my colleague Rebecca Lee, Esq., submitted proof of this surrender of firearm to Pretrial Officer Connie Weng via email. A true and correct copy of this correspondence is attached as **Exhibit B**.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct.

Executed on this 12th day of November, 2024, at Los Angeles, California.

/s/ Ronald L. Cheng

Ronald L. Cheng

EXHIBIT A



Modern Warrior Gunsmithing LLC
11276 Washington Place
Culver City, CA 90230
(855) MWG-1911
ModernWarriorGuns.com

Work Order

Project No: P4529 Box #:
Order Date: 10/29/2024 0

Chavez p, Christian
4040 W 2St Street
Los Angeles CA 90018
(213) 446-5466
christian@husseini.com

Handgun/Taurus/PT 24/7 PRO/9mm
Serial #: TA043138
Number of Mags: 0
Bag Type: Bag?: No

Services

Qty	Services	Rate	Sub-service Fee	Sub-service Selections	Notes	Discount	Total
1	Handgun Storage - Monthly	\$125.00	\$0.00			\$0.00	\$125.00

Service Total: \$125.00

Parts

Qty	Part	Unit Price	Discount	Tax	Part Total	Notes	Status
-----	------	------------	----------	-----	------------	-------	--------

Parts Total: \$0.00

Notes:

Client is in prison Contact Christian after month is over

Total: \$125.00
Discount: \$0.00
Total Paid: \$0.00

Outstanding Balance: \$125.00

Client understands that Modern Warrior Gunsmithing (hereinafter "MWG") is performing custom work, which is often reliant on ordering parts from external sources. These external sources as well as the pure custom nature may present unforeseen delays in completing client's project. As such, completion dates set forth herein are meant only as an estimate and are in no way meant to be a guaranteed date of completion. In addition, the end result of client's project will be based not only on the client's description of the project, but also the artistic interpretation of that description by MWG. Because of the highly custom nature of the work performed by MWG on Client's behalf, client hereby acknowledges and agrees that there can be no refunds, returns or exchanges for any reason whatsoever.

Expected Completion Date:

Signature:

Date: 10/29/2024

EXHIBIT B

From: Lee, Rebecca M.
To: [Connie Weng](#)
Cc: [Dyer, Aaron S.](#); [Cheng, Ronald L.](#); [Moreno, Helen](#)
Subject: RE: Ibrahim Ameen Alhusseini 2:24-mj-06166
Date: Tuesday, October 29, 2024 2:21:29 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[Fire Arm Surrender.pdf](#)
[U.S. Passport Surrender.pdf](#)
[Saudi Arabia Passport Surrender.pdf](#)

Hi Officer Weng,

I am writing to let you know that Ibrahim has surrendered both of his passports and his firearm. The receipts for his surrender of the two passports and his firearm are attached to this email.

Please let me know if you have any questions.

Thank you,

Rebecca

From: Connie Weng <Connie_Weng@cacp.uscourts.gov>
Sent: Monday, October 28, 2024 10:39 AM
To: Lee, Rebecca M. <rebecca.lee@pillsburylaw.com>
Cc: Dyer, Aaron S. <aaron.dyer@pillsburylaw.com>; Cheng, Ronald L. <ronald.cheng@pillsburylaw.com>
Subject: RE: Ibrahim Ameen Alhusseini 2:24-mj-06166

Hi Ms. Lee,

Thank you for the update. Please let me know if you need anything additional.

Thanks,

Connie



CONNIE WENG
U.S. PROBATION AND PRETRIAL SERVICES OFFICER
UNITED STATES DISTRICT COURT
CALIFORNIA CENTRAL PROBATION OFFICE
300 North Los Angeles Street
Los Angeles, CA 90012-3308
Office: (213) 894-2631 Mobile: (213) 598-7115 Fax: (626) 404-0192
Email: Connie_Weng@cacp.uscourts.gov

From: Lee, Rebecca M. <rebecca.lee@pillsburylaw.com>
Sent: Monday, October 28, 2024 9:59 AM
To: Connie Weng <Connie_Weng@cacp.uscourts.gov>
Cc: Dyer, Aaron S. <aaron.dyer@pillsburylaw.com>; Cheng, Ronald L. <ronald.cheng@pillsburylaw.com>

Subject: Ibrahim Ameen Alhusseini 2:24-mj-06166

CAUTION - EXTERNAL:

Hi Officer Weng,

Thanks for speaking with me this morning and confirming that you are now assigned to Ibrahim's case and that Officer Dalayna Ecklund is no longer our contact. As we discussed, we are working to surrender Ibrahim's passports and his firearm.

Ibrahim's assistant will be dropping the passports off at Suite 1410 at Roybal either later today or tomorrow. He will expect to receive a receipt after dropping the passports off.

Ibrahim will surrender his gun at a local armory, receive a receipt from the armory, and I will email you the receipt at this address.

Thank you,
Rebecca

Rebecca M. Lee | Counsel

Pillsbury Winthrop Shaw Pittman LLP

725 South Figueroa Street, 36th Floor | Los Angeles, CA 90017-5524

t +1.213.488.7208

rebecca.lee@pillsburylaw.com | [website bio](#)

AUSTIN BEIJING HONG KONG HOUSTON LONDON LOS ANGELES
MIAMI NASHVILLE NEW YORK NORTHERN VIRGINIA PALM BEACH
SACRAMENTO SAN DIEGO SAN FRANCISCO SHANGHAI
SILICON VALLEY TAIPEI TOKYO WASHINGTON, DC



The contents of this message, together with any attachments, are intended only for the use of the individual or entity to which they are addressed and may contain information that is legally privileged, confidential and exempt from disclosure. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this message, or any attachment, is strictly prohibited. If you have received this message in error, please notify the original sender or the Pillsbury Winthrop Shaw Pittman Service Desk at Tel: 800-477-0770, Option 1, immediately by telephone and delete this message, along with any attachments, from your computer. Nothing in this message may be construed as a digital or electronic signature of any employee of Pillsbury Winthrop Shaw Pittman. Thank you.

CAUTION - EXTERNAL EMAIL: This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.